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17 Attorneys for Defendants

18 HAMAMATSU CORPORATION,

HAMAMATSU PHOTONICS K.K., and

19 PHOTONICS MANAGEMENT CORP.

20 **UNITED STATES DISTRICT COURT**
21 **NORTHERN DISTRICT OF CALIFORNIA**

22 SEMICAPS PTE LTD.,

23 Plaintiff,

24 vs.

25 HAMAMATSU CORPORATION, et al.,

26 Defendants.

CASE NO. 17-cv-03440-DMR

**DECLARATION OF K. KEVIN CHU
IN SUPPORT OF DEFENDANTS'
REVISED UNOPPOSED MOTION FOR
ISSUANCE OF LETTER OF REQUEST
FOR INTERNATIONAL JUDICIAL
ASSISTANCE TO DEPOSE AND
REQUEST DOCUMENTS FROM IPFA**

1 I, K. Kevin Chu, hereby declare and state as follows:

2 1. I am an attorney with Quinn Emanuel Urquhart & Sullivan, LLP, counsel for
3 Defendants Hamamatsu Corporation, Hamamatsu Photonics K.K., and Photonics Management Corp.
4 (collectively, “Defendants”).

5 2. I am duly licensed to practice law in the District of Columbia and the State of Virginia
6 and am admitted *pro hac vice* before this Court.

7 3. I have personal knowledge of the facts set forth in this declaration, and if called as a
8 witness, I would testify competently to those facts.

9 4. Attached hereto as Exhibit 1 is a true and correct copy of the Letter of Request for
10 International Judicial Assistance pursuant to the Hague Convention of 18 March 1970 on the Taking
11 of Evidence Abroad in Civil or Commercial Matters (“Letter of Request”), that Defendants
12 respectfully ask the Court to sign and issue, such that Defendants may request the deposition and
13 documents of the Singapore-based International Symposium on the Physical and Failure Analysis of
14 Integrated Circuits (“IPFA”).

15 5. Counsel for Plaintiff SEMICAPS Pte Ltd. has confirmed that Plaintiff does not oppose
16 this request for issuance of a Letter of Request for International Judicial Assistance.

17
18 I declare under penalty of perjury under the laws of the United States of America that the
19 above is true and correct and that this Declaration was executed on April 15, 2020 in Washington,
20 D.C.

21
22 Dated: April 15, 2020

/s/ K. Kevin Chu
K. Kevin Chu